

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON FOR KING COUNTY

BERT STARES et al,

Plaintiffs,

vs.

MAURIE PALMBERG et al,

Defendants.

No. 367315

ANSWER

FILED

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WORMAN

KING COUNTY

Comes now the defendant, Annie Stangroom, in the above entitled action and in answer to the complaint of the plaintiffs, admits, denies, and alleges as follows:

I.

Admits that the parties herein are joint owners of the following described property in King County, Washington:

"Those portions of Government Lots 1, 2 and 3 of Section 20, Township 25 North, Range 6 E.W.M., described as follows:

PARCEL "A"

Beginning at a point on the North line of said Government Lot 1, 630 feet East of the Northwest corner thereof; thence South 900 feet; thence Southwesterly, at right angles to the right-of-way of the Northern Pacific Railway Company (formerly the Seattle and International Railway) to the Northeasterly line of said right-of-way; thence Southeasterly, along said Northeasterly line to the South line of said Government Lot 1; thence East, along said South line to the Southeast corner thereof; thence North, along the East line thereof, to the Northeast corner thereof; thence West, along the North line, to the point of beginning, EXCEPT County Road.

PARCEL "C"

Beginning at the Southeast corner of said Government Lot 2; thence North, along the East line thereof, 110 feet; thence West 87 feet to the Northeasterly line of the right-of-way of the Northern Pacific Railway Company (formerly the Seattle and International Railway); thence Southeasterly, along said Northeasterly line, to the point of beginning, TOGETHER WITH second class shore lands adjoining, EXCEPT county Road."

and the second class shore lands adjoining and butting Parcel's

"B" and "C".

PHILIP W. SCHOLZ
ATTORNEY AT LAW
1011 FOURTH AVE.
BUILDING
SEATTLE 1, WASH.
MAIN 2224

Defendant, Annie Stangroom, denies that the parties herein are joint owners of the following described property in King County, Washington:

"Those portions of Government Lots 1, 2 and 3 of Section 20, Township 25 North, Range 6 E.W.M., described as follows:

PARCEL "B"

Beginning at the Northeast corner of said Government Lot 2; thence South, along the East line thereof, 569.64 feet; thence West 211.58 feet; thence South-westerly, at right angles to the right-of-way of the Northern Pacific Railway Company (formerly the Seattle and International Railway), 15.3 feet, to the Northwesterly line of said right-of-way; thence Northwesterly, along said Northwesterly line, to the North line of said Government Lot 2; thence East, along said North line, to the point of beginning, TOGETHER WITH second class shore lands adjoining, except County Road.

II.

Admits the allegations contained in Paragraph II of the said complaint.

III.

Denies the allegations contained in Paragraph III of the said complaint.

Further answering said complaint and by way of AFFIRMATIVE DEFENSE, defendant Annie Stangroom, alleges:

I.

That the following described real property situated in King County, Washington, is the community property of the defendant, Annie Stangroom and Stuart L. Stangroom, her husband, and that none of the other parties herein have any interest whatever in the following described real property situated in King County, Washington:

"those portions of Government Lots 1, 2 and 3 of Section 20, Township 25 North, Range 6 E.W.M., described as follows:

PARCEL "A"

Beginning at the Northeast corner of said Government Lot 2; thence South, along the East line thereof, 569.64 feet; thence West 221.58 feet; thence South-westerly, at right angles to the right-of-way of the Northern Pacific Railway Company (formerly the Seattle and International Railway), 15.3 feet, to the


Northeasterly line of said right-of-way; thence
Northwesterly, along said Northeasterly line, to
the North line of said Government Lot 2; thence
East, along said North line, to the point of
beginning, TOGETHER WITH second class shore lands
adjoining, EXCEPT County Road.

WHEREFORE, the defendants having fully answered the plaintiff's
Complaint, defendants pray that the plaintiffs recover nothing thereby, and
that the defendants have and recover from the plaintiff their costs and
disbursements herein to be taxed.



PHILIP W. SCHOEL, Attorney
for defendants.

STATE OF WASHINGTON)
 (ss.
COUNTY OF KING)

ANNIE STANGROOM, being first duly sworn on oath, deposes and says
that she is one of the defendants named herein; that she has read the fore-
going Answer, knows the contents thereof, and believes the same to be true.


ANNIE STANGROOM

SUBSCRIBED and SWORN to before me this 8th day of November, 1945.


NOTARY PUBLIC in and for the State
of Washington, residing at Seattle.

COPY RECEIVED
DATE 11/9/45
FIRM W. C. Sullivan
BY W. C. Sullivan

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